

1 JOHN A. RUSSO, City Attorney - State Bar #129729
RANDOLPH W. HALL, Assistant City Attorney – State Bar #080142
2 JAMES F. HODGKINS, Supervising Trial Attorney – State Bar #142561
CHARLES E. VOSE, Senior Deputy City Attorney, State Bar No. 139700
3 One Frank H. Ogawa Plaza, 6th Floor
Oakland, California 94612
4 Telephone: (510) 238-2961 Fax: (510) 238-6500
cevose@oaklandcityattorney.org
5 X03361/578518

6 Attorneys for Defendant
CITY OF OAKLAND
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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11

12 EDWARD J. PROUDFOOT AND
MICHELLE MILLIORN

Case No. C09-01492 WHA

13
14 Plaintiffs,

**STIPULATION TO CONTINUE
DATE TO FILE RESPONSIVE
PLEADING**

15 v.

16 CITY OF OAKLAND AND COUNTY OF
ALAMEDA, ET AL.

17 Defendants.
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20 The parties to the above captioned litigation hereby stipulate, by and through their
21 undersigned counsel of record, to continue the date for Defendants City of Oakland and
22 Alameda County to file responsive pleadings in this case from June 10, 2009 to June 30,
23 2009.

24 The reason for this stipulation is the parties are currently negotiating on the filing of
25 a First Amended Complaint in this matter in order to avoid defendants filing a Motion to
26 Dismiss pursuant to F.R.C.P. Rule 12(b)(6).

1 DATED: JUNE 10, 2009

2
3 JOHN A. RUSSO, City Attorney
4 RANDOLPH W. HALL, Assistant City Attorney
5 JAMES F. HODGKINS, Supervising Trial Attorney
6 CHARLES E. VOSE, Senior Deputy City Attorney

7 By: _____/s/
8 Attorneys for Defendant
9 CITY OF OAKLAND

10 DATED: JUNE 10, 2009

11 DAVID J. BEAUVAIS, ESQ.

12 By: _____/s/
13 Attorney for Plaintiffs
14 EDWARD PROUDFOOT and
MICHELLE MILLIORN

15 DATED: JUNE 10, 2009

16 RANDY ANDRADA, ESQ.
17 ANDRADA & ASSOCIATES

18
19 By: _____/s/
20 Attorney for Defendant
21 ALAMEDA COUNTY
22
23
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1 DATED: JUNE 10, 2009

2
3 JOHN A. RUSSO, City Attorney
4 RANDOLPH W. HALL, Assistant City Attorney
5 JAMES F. HODGKINS, Supervising Trial Attorney
6 CHARLES E. VOSE, Senior Deputy City Attorney

7 By: /s/
8 Attorneys for Defendant
9 CITY OF OAKLAND

10 DATED: JUNE 10, 2009

11 DAVID J. BEAUVAIS, ESQ.

12 By: 
13 Attorney for Plaintiffs
14 EDWARD PROUDFOOT and
15 MICHELLE MILLIORN

16 DATED: JUNE 10, 2009

17 RANDY ANDRADA, ESQ.
18 ANDRADA & ASSOCIATES

19 By: /s/
20 Attorney for Defendant
21 ALAMEDA COUNTY
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ORDER

Pursuant to stipulation of the parties and good cause appearing therefore, it is hereby ordered that the date for Defendants City of Oakland and Alameda County to file responsive pleadings in this case is continued from June 10, 2009 to June 30, 2009.

IT IS SO ORDERED.

Dated: June 11, 2009

